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Social Finance, Inc. d/b/a SoFi and  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

RUBEN JUAREZ, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

SOCIAL FINANCE, INC. d/b/a SOFI, and  
SOFI LENDING CORP. d/b/a SOFI,

Defendants.

CASE NO: 4:20-cv-03386-HSG

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER TO SET BRIEFING SCHEDULE  
IN RESPONSE TO DEFENDANTS'  
MOTION TO STAY DISCOVERY**

Complaint Filed: May 19, 2020

District Judge Haywood S. Gilliam, Jr.

Pursuant to civil Local Rules 6-1(b) and 6-2, Plaintiff Ruben Juarez (“Plaintiff”), through counsel, along with counsel for Defendants Social Finance, Inc. d/b/a SoFi and SoFi Lending Corp. d/b/a SoFi (collectively, “SoFi”), respectfully submit the following Joint Stipulation and Proposed Order to Set Briefing Schedule in Response to SoFi’s Motion to Stay Discovery, ECF No. 29.

# **RECITALS**

WHEREAS, on May 19, 2020, Plaintiff filed a putative class action Complaint against SoFi in the above-captioned matter (D.E. 1);

WHEREAS, on June 5, 2020, pursuant to Local Rule 6-1(a), Plaintiff and SoFi (together, the “Parties”) filed a Joint Stipulation to Extend Time to Respond to Initial Complaint, extending the time for SoFi to respond to the Complaint for a period of approximately twenty-one days, up to and including July 9, 2020 (D.E. 14);

WHEREAS, counsel for Plaintiff requested a modified briefing schedule in the event that SoFi filed a responsive Motion, and following meet and confer between counsel for Plaintiff and counsel for SoFi, the Parties agreed to modify the briefing schedule as follows, as set forth in the Joint Stipulation filed at ECF No. 24:

- Plaintiff’s Opposition to Defendants’ Motion in response to Plaintiff’s Complaint shall be due 21 days following the filing of Defendants’ Motion, and therefore shall be filed on or before July 30, 2020;
- SoFi’s Reply shall be due 14 days following the filing of Plaintiff’s Opposition, and therefore shall be filed on or before August 13, 2020;

WHEREAS, on July 7, 2020, the Court approved that Joint Stipulation, ECF No. 26;

WHEREAS, on July 9, 2020, SoFi filed a responsive Motion with a Motion Hearing set for August 27, 2020, ECF No. 28;

WHEREAS, on July 9, 2020, SoFi also filed a Motion to Stay Discovery with a Motion Hearing set for August 27, 2020, ECF No. 29;

WHEREAS, the Parties have met and conferred and now agree that the same briefing schedule that applies to SoFi’s responsive Motion should also apply to SoFi’s Motion to Stay

1 Discovery to provide the Parties time to evaluate and analyze the arguments and prepare a  
2 response;

3 WHEREAS, the Parties state that this request is not the result of dilatory conduct;

4 WHEREAS, the parties state that both Motions are set for the same Motion Hearing date;

5 WHEREAS, this Court has set the Initial Case Management Conference for August 25,  
6 2020 at 2:00 PM with the Case Management Statement due on August 18, 2020 (ECF 20) and,  
7 accordingly, this extension of time will not alter the date or any event or deadline already fixed by  
8 Court order;

9 WHEREAS, the Parties affirm that no party will be prejudiced by the short extension, nor  
10 will the requested extension unduly delay the case;

11 WHEREAS, the Parties previously filed a Joint Stipulation to Extend Time to Respond to  
12 Initial Complaint (ECF No. 14) and a Joint Stipulation to Set Briefing Schedule in Response to  
13 Plaintiff's Complaint (ECF No. 24).

14 **STIPULATION**

15 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff  
16 and SoFi through their respective undersigned counsel that:

- 17 1. Plaintiff's Opposition to SoFi's Motion to Stay Discovery shall be filed on or  
18 before July 30, 2020;
- 19 2. SoFi's Reply shall be filed on or before August 13, 2020;
- 20 3. The only prior extensions of time in this action were a 21-day extension of time for  
21 SoFi to respond to the Complaint and a 7-day extension of the standard briefing  
22 schedule for Plaintiff's Opposition to Sofi's Responsive Motion and Sofi's Reply;
- 23 4. This extension will not affect any other deadlines set by the Court in this case;
- 24 5. This stipulation is without prejudice to the rights, claims, arguments, and defenses  
25 of all parties; and
- 26 6. All other signatories listed, and on whose behalf the filing is submitted, concur with  
27 the content in this Stipulation and have authorized the filing.

1 IT IS SO STIPULATED.

2  
3 DATED: July 10, 2020

**McGUIREWOODS LLP**

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5 By: /s/ K. Issac deVyver

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22 *Social Finance, Inc. d/b/a SoFi and*

23 *SoFi Lending Corp. d/b/a SoFi*

24  
25 DATED: July 10, 2020

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27 By: /s/ Michael Litrownik

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25 \*Admitted *Pro hac vice*

26 \*\**Pro hac vice* application forthcoming

27 *Attorneys for Plaintiff Ruben Juarez and the*  
28 *Proposed Class*

**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED,**

DATED: 7/14/2020



Haywood S Gilliam, Jr  
United States District Judge